

BEFORE THE
POSTAL REGULATORY COMMISSION
WASHINGTON, D.C. 20268-0001

Public Inquiry on Modification of Service
Performance Measurement Systems for
Market Dominant Products

Docket No. PI2021-3

COMMENTS OF THE NATIONAL POSTAL POLICY COUNCIL

(September 17, 2021)

The National Postal Policy Council respectfully submits these comments on the Commission's Notice and Order in this proceeding.¹

This proceeding is to review the Postal Service's proposal to conform its service performance measurement systems to the service standards that were the subject of Docket No. N2021-1. The Postal Service intends to implement the service standard reductions addressed in that proceeding notwithstanding important concerns voiced by the public and the Commission. Although those service standard reductions themselves are beyond the scope of this proceeding, the Commission's advisory opinion in Docket No. N2021-1 is relevant to the Postal Service's proposed modifications to its service performance measurement. Although the Commission's advisory opinion identified various concerns, NPPC will address in these comments only one—the treatment of remittance mail.

¹ Notice and Order Initiating Proceedings To Consider Modifications To Market Dominant Service Performance Measurement Systems, Order No. 5975 (Sept. 3, 2021).

Remittance mail is of enormous importance both to individuals who use it to submit payments, and to the businesses that rely upon it for revenues. It is one of the most valuable parts of First-Class Mail. In the N2021-1 advisory opinion, the Commission noted that even the Postal Service recognized that remittance mailers could have unique needs that could be detrimentally affected by the changes. *Advisory Op.* at 152. Chairman Kubayanda, after reviewing how a reduction in the service provided remittance mail could affect the value of the mail to not only the vulnerable populations that rely upon that mail, but also to the commercial mailers that make use of remittance mail, stated:

It is conceivable that there could be a robust plan to address these concerns, but, if so, it is unknown because these implications are scarcely remarked upon, let alone thoroughly evaluated, in the case presented by the Postal Service.

Separate View of Chairman Kubayanda, at 7.

Nothing in the proposed revisions to service performance measurement system filed by the Postal Service responds to this concern. Indeed, the word “remittance” does not appear anywhere in the proposed system. Nor is there any indication that the Postal Service intends to measure remittance mail service performance. Instead, despite remittance mail’s unique needs, it appears that such mail will simply be lumped into the much broader Single-Piece Letters/Cards in a way that will mask the actual reductions in service that remittance mail will experience.

That omission is not in the interest of the Postal Service, which should strive to be attentive to the effects of its actions on all of its customers. That is

particularly true in the case of dependent mailer groups that the Commission has identified as being of special concern. And it is even more important when the effects on those mailer groups can have significant effects on other mailers (such as the commercial mailers that offer remittance mail as an option to their customers). Nor does it serve the interest of transparency in market-dominant postal services.

Accordingly, the Commission should require the Postal Service to modify its service performance measurement plan to track and publish the service performance provided to remittance mail separately consistent with the Commission's views expressed in N2021-1. Furthermore, the Commission should initiate a proceeding, pursuant to 39 U.S.C. §3652(e)(2), to improve the accuracy of the reports of service quality provided to remittance mail.

Respectfully submitted,

Arthur B. Sackler
Executive Director
NATIONAL POSTAL POLICY COUNCIL
1629 K Street, N.W.
Suite 300
Washington DC 20066
(202) 508-3687

By: /s/ William B. Baker
William B. Baker
POTOMAC LAW GROUP, PLLC
1300 Pennsylvania Avenue, N.W.
Suite 700
Washington, DC 20004
(571) 317-1922
wbaker@potomacclaw.com